The Honorable Michael K. Powell, Chairman
Federal Communication Commission
445 12th Street, S.W.
Room 8-B201
Washington D.C. 20554

Subject: Comments to the FCC regarding the Notice of Proposed Rule Making To Explore Ways to Improve the Spectrum Environment For Public Safety Operations in the 800 MHz Band, WT Docket No. 02-55

The ISG Cleveland Inc. steel making facility located at 3100 East 45th Street Cleveland, Ohio, is the former LTV Steel Cleveland Works. As LTV, production ceased on December 19, 2001 due to bankruptcy. The reopening of this facility by International Steel Group Inc. is of critical economic importance to the city of Cleveland, the State of Ohio, employers, suppliers and the population of the surrounding areas. The plant has extensive experience serving nearly all of the domestic and transplant automotive manufacturers. Steel provided by this facility goes into the appliance, oil well drilling, building and construction industries among many other applications. The Cleveland plant, located on 1,100 acres, was originally two separate steel mills and continues to operate the larger portion of the plant on the east side of the Cuyahoga River and maintains the idled west side plant. Two wholly owned short line railroads provide in plant rail service to move molten metal, steel slabs and coils, and consumable cargoes and commodities.

A 10-channel, 800 mhz trunked radio system was installed in this facility in 1994. Its continuing purpose is to provide a common communications system for all facets of the plant operation, which includes front line production operation, maintenance, general utilities co-ordination, rail and vehicular transportation communication as well as safety and security forces co-ordination. The security and emergency response group was previously using an antiquated VHF system. Communications between both groups during an emergency was difficult because conversations had to be relayed by telephone to a security officer in the command center. Using a single, plant wide communication system greatly improved communications between emergency response teams and public safety workers, providing for far better site and security control during hazmat incidents. Quicker and better communications can save lives.

Operation and protection of the 1,100 acre facility, its employees and the community is assisted by dividing the radio system into 100 talk groups distributed among thirteen departments, transportation, security, safety, and emergency response teams. The ISG security group operates five gates during normal business hours, a command center 24 hours a day, 7 days a week, and provides a constant roving patrol of the facility. All fire alarms and 9-1-1 emergency calls are received there and security personnel are responsible for

dispatching emergency responders and providing them with up-to-date information. Prevention focuses on process safety, fire prevention, housekeeping, employee training and record-keeping. The emergency response organization provides 24-hour immediate response to site incidents, which include medical emergencies, fires, chemical spills and releases. In the mitigation of these emergencies, additional resources are frequently called upon to assist first responders. Resources include:

- Chemical operators
- Environmental engineers
- Facility electrical and mechanical service employees
- ISG Emergency Response Team Leader (ERTL)
- Local city fire department, EMS, hazmat, and fire rescue
- Local hospital and medical clinic
- Safety and security personnel

Facility emergency responders are knowledgeable of building layouts, electrical systems and chemical storage areas as well as the various processes conducted throughout the facility. Radios play an important communication role for these response teams and associated contacts. During an emergency, radio contact amongst all the various disciplines of responders and the ERTL is critical to minimizing injuries and equipment damage. During a weekday, shift over 1,000 employees, contractors and visitors can be present within the facility.

The system was established with 10 channels and has grown to over 1500 radios communicating between 100 talk groups and a single plant wide emergency channel. Along with the production, maintenance, transportation, safety and security groups, the other users on the system include maintenance shops, service groups, engineers, computer support, chemical operators, and environmental personnel. All safety and security radios have priority over all other radios when competing for system resources. All radios are configured with a direct channel to our security command center. Our emergency response officers also scan this channel. An emergency situation observed or experienced by anyone carrying a radio can be instantly communicated to safety and security personnel. Messages can also be broadcast to all radios on the system simultaneously from select radios

Aside from the benefits of greatly improved emergency communications, the increase in productivity and efficiency among the various groups using radios has increased considerably. We are averaging more than 40,000 calls per business day on the system. In the past, foremen and supervisors had to rely on pagers and PA systems to contact workers. This meant that a worker had to stop what they were doing, go and find a telephone, and call back to the foreman. Workers stay on the job longer, and managers are not tied to their telephones waiting for calls to come back. It is also very advantageous to have the ability to talk to all members in a talkgroup in one call instead of having to call each person individually when necessary. We have installed telephone interconnect capability on our system which allows select users to access our PBX system and place

and receive telephone calls with their radios, adding even more efficiency to their communications.

In 1994, LTV spent approximately $700,000 on equipment and installation for the new trunked radio system. The average ongoing yearly cost to maintain equipment and modify radio configurations on the system over the last nine years has been $100,000/year. This investment has resulted in an extremely efficient and versatile communications system that has become an integral part of the overall operation of our facility. A recent review of replacement cost for a like system in kind would be $1,900,000. Labor for configurations into talk groups would be an additional $100,000, as well as partial service disruption during transition. This cost impact on a newly starting steel manufacturing facility would make voluntary relocation to the 900 MHz band impractical and be devastating to bottom line costs and a successful startup.

We do not believe that any public wireless provider can deliver the level of service and performance that our own system is providing for us today. We further believe that a regional disaster of any sort would completely tie up public networks, rendering them useless for organizations such as our own. Being downgraded to secondary licenses would make our emergency response communication useless in a parallel emergency response situation. The loss of an 800 Mhz trunked system such as ours would place a communications roadblock on our ability to conduct daily business. Set-to-set portable handsets do not possess the power that a repeater-based radio network affords. In effect, we would have no alternatives for effective communications if auctioning of the frequencies caused us to lose our current license.

Nextel acknowledges its own operations are the primary cause of the interference currently being experienced by public safety and other private radio users in the 800 MHz band. It should not be the burden of other 800 Mhz users to remedy the problems caused by Nextel and other CMRS providers. Resolution by the ever-growing cellular providers, additional guard bands and technical advancements should be the direction of the resolution to the public safety communication issue. ISG Cleveland Inc. strongly urges the commission to consider the NAM/MARFAC and other coalition alternatives that are being developed for elimination the 800 MHz public safety interference problem. Such solutions could bring resolution to public safety concerns without resulting in the substantial expense and disruptive reallocation that is called for in the Nextel White Paper.

Very Truly Yours,

/s/ Frank Palazzolo

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